

alizadeh
Employment Lawyer

7545 Irvine Center Dr, Suite 200
Irvine, CA 92618
Telephone: (949) 606-2845
Facsimile: (949) 264-9345
www.lawyerforemployees.com

Arash N. Alizadeh
Attorney at Law
aalizadeh@lawyerforemployees.com

ALIZADEH EMPLOYEES LAW, PROF. CORP.

October 10, 2018

VIA PAGA WEB PORTAL

Attn: PAGA Administrator
1515 Clay Street, Ste. 801
Oakland, CA 94612

Subject: *Jassim Addal v. Amazon.com, Inc.; Scoobeez*
L.A. County Superior Court case no. BC719783 (filed 9/5/18)

Dear Representative:

This office represents JASSIM ADDAL (Employee), a former employee of SCOOBEEZ, INC. a/k/a SCOOBEEZ and AMAZON.COM, INC. (Employer).

Employer may be contacted directly at:

SCOOBEEZ, INC.
396 Pasadena Ave
Pasadena CA 91105

AMAZON.COM, INC.
251 Little Falls Drive
Wilmington DE 19808-1674

Employee intends to seek penalties on behalf of Employee and other current and former employees for violations of the California Labor Code, which are recoverable under California Labor Code §2699 et seq.¹ Employee is seeking penalties on behalf of the State of California of which 75% will be kept by the state, while 25% will be available to aggrieved employees. This letter is sent in compliance with the reporting requirements of California Labor Code §2699.3.

¹ All statutory references are to the California Labor Code unless otherwise noted.

the Labor Code sections violated by Employer are outlined in the complaint that was filed with the Orange County Superior Court on 9/5/18 and is submitted along with this letter and incorporated herein by reference in its entirety as fully set forth in this letter.

Additionally, E

Labor Code § 6400

-Labor Code § 6400 by failing to furnish employment and a place of employment that is safe and healthful for the employees therein. Employee's worksite was old, dirty and dilapidated. There was so much dust in the work place that Employee and other employees were often coughing as result of inhaling it. This situation was exacerbated when the central air system recirculated this dust throughout the branch and made it airborne.

Labor Code § 6401

-Labor Code § 6401 by failing to provide emergency instructions such as fire, earthquake and other drills.

Labor Code § 6401.7

-Labor Code § 6401.7 by failing to implement and maintain an injury prevention program because Employer failed to provide an occupational safety and training program, conduct periodic safety inspections, implement a system for correcting unsafe and unhealthy conditions, failure to provide a discipline system, failing to keep appropriate records of steps taken to implement and maintain the program, among other omissions that violate section 6401.7.

Labor Code § 6404

-Labor Code §6404 by failing to occupy or maintain a place of employment that is safe and healthful as explained above.

Labor Code § 6407

-Labor Code § 6407 by failing to comply with provisions of the occupational safety and health standards and orders made pursuant to Division 5 of the Labor Code sections 6300 et seq., specifically the following sections of the General Industry Safety Orders ("GISO"),

Therefore, on behalf of all affected employees, Employee seeks all applicable penalties related to these violations of the California Labor Code pursuant to California's "Labor Code Private Attorney General Act of 2004."

Thank you for your attention to this matter. If you have any questions, please contact me.

Dated: October 10, 2018

ALIZADEH EMPLOYEES LAW, PROF. CORP.



ARASH N. ALIZADEH
Attorney for Employee